

LPA

UNITED STATES DISTRICT COURT

MIDDLE

DISTRICT OF

NORTH CAROLINA

UNITED STATES OF AMERICA
 V.
 JEANNETTE TYE RUNYON
 686 S. Happy Hill
 Lexington, NC

CRIMINAL COMPLAINT

Case Number: 1:07MJ165-1

(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about November 5, 2007 in Davidson County, in
 (Date)
 the Middle District of North Carolina defendant(s) did,

(Track Statutory Language of Offense)

did knowingly and willfully make a false statement in an application for a United States passport and willfully and knowingly provided a false statement in an application for a Social Security Card,

in violation of Title 18; 42 United States Code, Section(s) 1542; 408(a)(6).

I further state that I am a(n) SA with Diplomatic Security Service and that this complaint is based on the
 Official Title
 following facts:

See attached Affidavit

Continued on the attached sheet and made a part of this complaint: x Yes ☒ No

Signature of Complainant

GREG A. SHERMAN
 Printed Name of Complainant

Sworn to before me and signed in my presence,

November 15, 2007

Date

at

Greensboro, North Carolina

City and State

P. Trevor Sharp, United States Magistrate Judge

Name and Title of Judge

Signature of Judge

LPA

AFFIDAVIT

I, Greg A. Sherman, hereafter designated as Affiant, having been duly sworn, do hereby depose and state as follows:

(1) I am a Special Agent with the Diplomatic Security Service (DSS) of the U.S. State Department and have been so employed for over ten years. Prior to joining the DSS, I was employed as a police officer for the city of Columbia, South Carolina for one year. As part of my official duties, I have worked overseas in United States Embassies and am currently assigned to investigate persons who utilize fraudulent documents and make false statements on applications for U.S. passports, among others.

(2) This affidavit is submitted in support of an application for a criminal complaint and arrest warrant for Jeanette Tye RUNYON (D-POB: 09/06/1951 - NY) based on a showing of probable cause that she has committed passport fraud in violation of 18 U.S.C. § 1542 and Social Security fraud in violation of 42 U.S.C. § 408(a)(6). The information contained in this affidavit comes from my own investigation and reports I have received from other government officials.

(3) On November 5, 2007, an individual identifying herself as Jeanette T. RUNYON appeared at the U.S. Embassy in Kiev, Ukraine and attempted to obtain a U.S. Passport and Social Security Number (SSN) for a three-week old infant, claiming the

child was her own biological child. In support of this, RUNYON supplied a Ukrainian birth certificate listing Jeanette RUNYON and Lawrence Woolslayer as the parents. RUNYON completed and submitted a U.S. Passport Application (DS-11) and a Social Security Card Application (SS-5-FS) on behalf of the minor child, listing herself as the mother of the child on both. RUNYON then signed, dated, and affirmed the accuracy of said forms in the presence of the U.S. Consular Officer.

(4) The U.S. Consular Officer interviewing RUNYON and examining her documents noted several inconsistencies and determined that RUNYON had arrived in the Ukraine two days after the child was born. The Consular Officer queried RUNYON about this and RUNYON admitted that the child was conceived clinically from a sperm and egg donated by two anonymous donors and carried to term in a surrogate mother in the Ukraine. RUNYON admitted that neither she nor her husband had contributed any genetic materials to the child, establishing that she and her husband were not the child's parents.

(5) Based upon this information, DSS Special Agent Matthew Q. Maguire, assigned as the Assistant Regional Security Officer - Investigator (ARSO-I) at the U.S. Embassy in Kiev, was asked to assist. Special Agent Maguire interviewed RUNYON, upon which time she admitted to having paid approximately \$30,000 to a

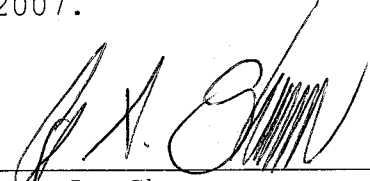
clinic in Kiev, Ukraine and to the surrogate mother. RUNYON then made statements to Special Agent Maguire and the Consular Officer that she chose this route to avoid international adoption procedures and that the clinic helped her conceal the facts of the case and obtain the fraudulent Ukrainian birth certificate for the child. RUNYON further admitted that she handled many of the arrangements via the internet, using one of the "multiple" computers at her residence (located at 686 S. Happy Hill, Lexington, NC) or her laptop and her three email accounts (jeanettevictoria@lycos.com, jeanettevictoria@aol.com, and jeanettevictoria@gmail.com). Ukrainian officials took the child into protective custody and arrested RUNYON for purchasing the baby.

(6) On November 7, 2007, a U.S. Embassy Consular Officer visited RUNYON in jail to confirm her well-being. During the visit, RUNYON asked the Consular Officer to pass a message to her husband in Lexington, NC, telling him to log-in as "Ladywolf" on Yahoo! groups (an internet-based forum) and inform the "others in the group" that she had been arrested and they should no longer use the clinic in Kiev. RUNYON admitted in the interview that she had knowledge of one other American couple that had procured a Ukrainian baby through a similar deception.

(7) On November 9, 2007, Affiant received scanned copies of email correspondence between RUNYON and the U.S. Embassy in Kiev, Ukraine. In an exchange dated October 30, 2007 and sent from RUNYON's email account: jeanettevictoria@lycos.com, RUNYON states ". . . I have called to make an appointment to report the birth of my daughter, a US citizen . . . I need a passport for her as we are returning to the US Nov 5."

(8) Accordingly, upon information and belief, Affiant believes probable cause exists that Jeanette Tye RUNYON has committed passport fraud - in violation of 18 U.S.C. § 1542 - and Social Security fraud - in violation of 42 U.S.C. § 408(a)(6).

This 15 day of November, 2007.



Greg A. Sherman
Resident Agent in Charge
Diplomatic Security Service
Greensboro, North Carolina

Subscribed and sworn to before
me this 15 day of November, 2007.



E. TREVOR SHARP
United States Magistrate Judge